

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Affidavit in Support of Criminal Complaint

I, Yamari Padilla - Collazo, being duly sworn, depose and state:

1. I am a Special Agent (SA) with the U.S. Homeland Security Investigations (hereinafter HSI). I have been employed with HSI as a Special Agent since April 2024. I graduated from the Criminal Investigator Training Program and from the Homeland Security Investigations (HSI), Special Agent Training Program, conducted at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA in October 2024. Prior to my carrier with HSI, I completed my master's degree in forensic science: advanced investigation at the University of New Haven in Connecticut. I worked for the Department of Homeland Security (DHS) under the Transportation Security Administration (TSA) as a Lead Transportation Security Officer (LTSO) at the Luis Muñoz Marin airport in Puerto Rico. I also worked for the Federal Emergency Management Agency (FEMA) as an inspector for natural disasters and case manager for federal funds programs.

2. I completed my bachelor's degree in interdisciplinary studies with concentrations in psychology and criminal justice at Tennessee State University in Nashville, TN.

3. I am presently assigned to Homeland Security Investigations (HSI), Office in Arecibo, Puerto Rico. The HSI Arecibo Office investigates international drug trafficking and money laundering organizations that utilize the aviation domain to smuggle narcotics and currency into and through the United States.

4. As a Special Agent my duties and responsibilities include conducting investigations of: alleged manufacturing, distributing or possession of controlled substances (Title 21, United States Code, Sections 841 (a)(1)); conspiracy to distribute a narcotic drug controlled substances into the United States (Title 21, United States Code, Section 846); importation of controlled

substances (Title 21, United States Code, Section 952(a); smuggling of goods into the United States (Title 18, United States Code, Section 545); failure to declare (31 United States Code 5316), money laundering (18 United States Code 1956), bulk cash smuggling (31 United States Code 5332), alien smuggling (8 United States Code 1324), entry without inspection (8 United States Code 1325) and related offenses.

5. This affidavit is submitted in support of a criminal complaint against **Santos Nolito GONZÁLEZ-Fernández, also known as “Santos González-Fernández”, “Santos Norito González-Fernández”, “Carlos Alberto Méndez-Meléndez”, and “Carlos Méndez-Meléndez”**, for violations of the following offenses: 8 U.S.C. § 1326(a) & (b)(2) (reentry of removed alien subsequent to an aggravated felony conviction), and 18 U.S.C. § 1028A(a)(1) (aggravated identity theft in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is a violation of 18 U.S.C. § 1028(f), knowing that the means of identification belonged to another actual person).

6. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation; on information conveyed to me by other law enforcement officials; and on my review of records, documents, and other physical evidence obtained during this investigation. This affidavit is not intended to include every fact observed by me or known by the government.

PROBABLE CAUSE

7. On February 18, 2025, around 12:00pm, Puerto Rico Police Bureau (“PRPB”) Bayamon Intelligent Division agents executed a local premises search warrant at a residence located in Urb. Campanilla Calle Euro #26, located in Toa Baja, Puerto Rico. The local search warrant authorized PRPB agents to search the premises for firearms.

8. Upon arriving to the residence, PRPD encountered GONZÁLEZ-Fernández, who had on his person two envelopes containing ready-to-deliver fraudulent documentation. The documentation consisted of three (3) birth certificates, three (3) social Security cards, and three (3) IDs. Furthermore, during the execution of the Search Warrant, PRPB agents seized approximately \$ 610.00 US dollars, two (2) laptops (one black and one silver), two (2) cell phones, two (2) pen drives, one (1) ID cards printer, one (1) printer and scanner, one (1) printer, two (2) hot seal machines, fraudulent birth certificates, fraudulent social security cards, fraudulent Puerto Rico driver licenses, two (2) rolls of true secure laminates rolls, white blank ID cards with serial number in the back, blank white ID cards, ink cartridges for printers, Puerto Rico Treasury Department stamps (originals), and one (1) shredder, among other material used in the manufacturing and distribution of fraudulent documents.

9. As a result, GONZÁLEZ-Fernández was arrested on scene and transported to the PRPB Intelligent Division located in Bayamon, Puerto Rico for further processing, and notified HSI Arecibo special agents (“SA”).

10. On the same date, HSI SAs responded to the PRPB Bayamon Intelligence Division and interviewed GONZÁLEZ-Fernández. HSI SAs advised GONZÁLEZ-Fernández of his Miranda rights, which he willingly waived.

11. After understanding and signing the Miranda form, GONZÁLEZ-Fernández admitted he had been manufacturing and distributing fraudulent documents to illegal aliens for the purpose of obtaining employment permits. GONZÁLEZ-Fernández stated he manufactures these fraudulent documents with sensitive information of real individuals that is provided to him by another subject. Below is a picture of some of the items seized by PRPB agents during the execution of the search warrant:



12. In addition, record checks were conducted for GONZÁLEZ–Fernández, which revealed the following immigration and criminal histories:

- a) On or about July 27, 2014, GONZÁLEZ-Hernández was encountered at the Luis Muñoz Marín International Airport in Carolina, Puerto Rico. During inspection, he claimed to be a U.S. citizen named Carlos Alberto Méndez-Meléndez and presented a Massachusetts ID card as proof of identity.
- b) As a result of the 2014 encounter, he was criminally prosecuted in criminal case number **14-519 (ADC)**, for violating 18 U.S.C. § 1546(a) (fraud and misuse of visas, permits, and other documents), and pursuant to a plea agreement, on

September 1, 2015, he was sentenced to time served to be followed by a one-year term of supervised release.

- c) In addition, he was placed on expedited removal proceedings and granted multiple stays of removal.
- d) On or about March 21, 2019, GONZÁLEZ-Fernández was encountered by PRPB agents during the execution of a search warrant. PRPB agents seized a Taurus pistol, model PT24/7 Pro CDS, loaded with a magazine containing fourteen rounds of .40 caliber ammunition.
- e) As a result of the 2019 encounter, he was criminally prosecuted in criminal case number **19-202 (CCC)**, for violating 18 U.S.C. §§ 922(g)(1) & 924(a)(2) (convicted felon in possession of a firearm), and pursuant to a plea agreement, on February 12, 2020, he was sentenced to time served, to be followed by a three-year term of supervised release.
- f) In addition, he was placed on administrative removal proceedings as a felon convicted of an aggravated felony, under Section 238 of the Immigration and Nationality Act. An administrative removal order was issued pursuant to which on March 17, 2020, GONZÁLEZ-Hernández was removed from the United States to the Dominican Republic.

13. Record checks also revealed that as of February 18, 2025, GONZÁLEZ-Fernández had not submitted an application to request permission to enter the United States (Form I-212) before the United States Citizenship and Immigration Services (“USCIS”). Thus, GONZÁLEZ-Fernández has not obtained consent from the Secretary of Homeland Security to enter the United

States, nor does he have any immigration documents allowing him to legally enter and/or remain in the United States.

14. On February 18, 2025, GONZÁLEZ-Fernández, a national and citizen of the Dominican Republic, was found in the United States after having been previously removed from the United States following an aggravated felony conviction.

15. Based upon my training, experience, and the abovementioned facts, I have probable cause to believe that GONZÁLEZ – Fernández has committed the following violation of Federal Laws: 8 U.S.C. § 1326(a) & (b)(2) (reentry of removed alien subsequent to an aggravated felony conviction), and 18 U.S.C. § 1028A(a)(1) (aggravated identity theft in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is a violation of 18 U.S.C. § 1028(f), knowing that the means of identification belonged to another actual person).

I hereby declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

YAMARI PADILLA-
COLLAZO

Digitally signed by YAMARI
PADILLA-COLLAZO
Date: 2025.02.19 15:05:21 -04'00'

Yamari Padilla - Collazo, Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Executed in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 5:07 PM
on this 19 day of February, 2025.



Marshal D. Morgan
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO